## Case 1:17-cv-02180-OTW Document 52 Filed 12/05/17 Page 1 of 2 Case 1:17-cv-02180-AJP Document 40 Filed 09/29/17 Page 1 of 2

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MONICA LUNA SAAVEDRA, individually and on behalf of others similarly situated,

DATI LED: 12/5/17

Docket No.: 17 CV 2180

(AJP)

Plaintiff,

-against-

MRS. BLOOM'S DIRECT, INC. (d/b/a MRS. BLOOM'S), MRS. BLOOM'S MOBILE LLC (d/b/a MRS. BLOOM'S), OREN SHAPIRO, and MAYBELLY GAMINEO,

Traverst: as appears

Hon. Andrew

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed memorandum of law, the undersigned will move this Court, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, 10007, before the Honorable Andrew J. Peck for an Order precluding Defendants from introducing or evincing at trial testimony concerning Plaintiff's immigration status, social security numbers, and tax filing information.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, are to be filed and served so as to be received by the undersigned no later than \_\_\_\_\_\_.

Dated: New York, New York September 29, 2017

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: <u>Michael Faillace</u>

Michael Faillace 60 East 42nd Street, Suite 4510 New York, New York 10165

(212) 317-1200 Attorneys for Plaintiff

To:
Jeffrey K. Davis, Esq.
Davis & Associates, P.C.
520 White Plains Road, Suite 500
Tarrytown, NY 10591
Telephone: (914) 586-3529
Fax: (914) 992-9468
jeff@jeffdavisesq.com
Attorney for Defendants